

Washington, D.C. 20554

REPLY COMMENTS OF JAMES CRYSTAL ENTERPRISES, LLC

JCE is the parent or affiliate of eight AM broadcast stations operating with varied technical facilities, located in Florida and the Southwestern United States.² JCE has a vital interest in this proceeding and is committed to the future of AM radio.

2 They are: KINF, 1020 kHz, Roswell NM, Class B, DA-2, 50 kW-U.
KXEG, 1280 kHz, Phoenix AZ, Class D, 2.5 kW-D, 0.049 kW-N.
KXEM, 1010 kHz, Tolleson AZ, Class B, DA-D, 15 kW-D, 0.25 kW-N.
WDJA, 850 kHz, West Palm Beach FL, Class B, DA-2, 5 kW-D, 1 kW-N
(CP: 50 kW-D, 24 kW-N)..
WFTL, 1400 kHz, Ft. Lauderdale FL, Class C, 1 kW-U.
WJNA, 1040 kHz, Boynton Beach FL, Class B, DA-2, 25 kW-D, 1.1 kW-N.
WLVI, 640 kHz, Royal Palm Beach FL, Class B, DA-2, 7.5 kW-D, 0.46 kW-N.
WORL, 660 kHz, Altamonte Springs FL, Class B, DA-1, 1.0 kW-U.

the system from Commission announcements and trade reports. Its representatives have attended NAB conventions at which the AM IBOC system was on display.

JCE supports iBiquity's request for IBOC operations on a daytime-only basis pending the adoption of final IBOC rules. At the same time, however, JCE embraces the proposal made by Clear Channel Communications, Inc. ("CCC") in its comments herein filed June 18, 2002: that there should be a further 6 dB reduction in the aggregated power level of the primary digital carriers as part of the interim adoption of hybrid AM IBOC, resulting in IBOC carriers that are 22 dB rather than 16 dB below the main carrier.³

CCC's basis for proposing a further reduction is compelling. The 20:1 or -26 dB permissible field strength ratio of desired-to-undesired signal for co-channel AM stations should be afforded to first adjacent, analog AM stations since the primary digital sidebands of a station implementing the hybrid AM IBOC system are in that station's first adjacent channel – stations on first adjacent channels to an analog station implementing hybrid AM IBOC will be *co-channel* to that station's primary digital sidebands.⁴

JCE agrees with CCC that adoption of this proposal will afford sufficient protection to existing analog AM signals and at the same time will facilitate a smooth digital transition.

Further, JCE shares the view expressed by CCC that the final IBOC methodology may need to adjust power levels of the primary digital carriers, depending on a given contour overlap situation. As CCC points out, the vast majority of first adjacent AM

³ See "Comments of Clear Channel Communications, Inc.", MM Docket No. 99-325, filed June 18, 2002, at 4.

⁴ As proposed, the hybrid AM IBOC provides only 22 dB of protection.

stations have contour overlap greater than the required 2:1 or -6 dB studied by the NRSC.⁵ A further 6 dB power reduction is a meaningful first step in recognizing that there will be special cases. The need for flexibility is illustrated by Figures 1 and 2 attached, prepared by Glen Clark & Associates. Figure 1 depicts the 0.5 mV/m nighttime skywave contour of WSM, 650 kHz, Nashville TN, in relation to JCE's first adjacent facilities WORL, 660 kHz, Altamonte Springs (Orlando) FL, and WLVI, 640 kHz, Royal Palm Beach FL. Figure 2 depicts the 0.5 mV/m nighttime skywave contour of KTWO, 1030 kHz, Casper WY, in relation to JCE's first adjacent facilities KINF, 1020 kHz, Roswell NM.⁶ To reiterate, it is critical that the final IBOC methodology incorporate flexibility in determining the appropriate power level of the primary digital carrier in order to accommodate any given contour overlap situation.

Accordingly, and subject to the foregoing qualifications, JCE respectfully requests that the Commission adopt the iBiquity proposals.

Respectfully submitted,

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⁵ CCC Comments, at 4.

⁶ Although the nighttime skywave versus nighttime groundwave coverages are depicted in Figures 1 and 2, the principle is the same regardless of the mode of operation.

Figure 1 - Map Showing Impact of WSM(AM) Night Skywave on WLWJ(AM) and WORL(AM) Night Groundwave

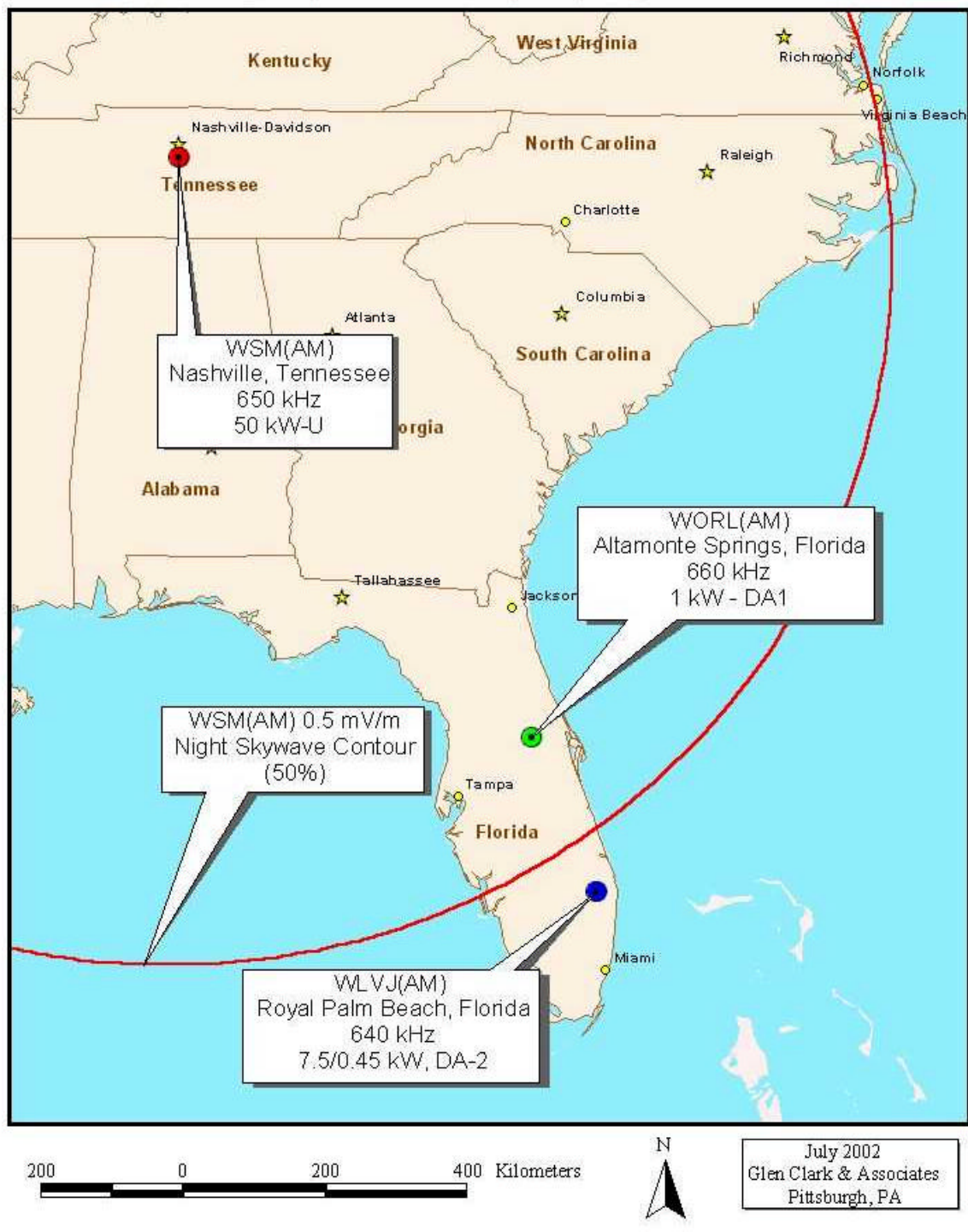


Figure 2 - Map Showing Location of KTWO(AM) Night Skywave Contour to KINF(AM) Night Groundwave Contour

